

THE PECK LAW FIRM, PLLC

HILLCLIMB COURT AT THE HISTORIC PIKE PLACE MARKET

1423 WESTERN AVENUE

SEATTLE, WASHINGTON 98101-2021

(206) 382-2900

FAX: (206) 382-2128

KEVIN A. PECK

ALSO ADMITTED TO PRACTICE:

ILLINOIS

FLORIDA

October 18, 2019

Via email: matthew.hoff@usdoj.gov

Via email: steven.d.clymer@usdoj.gov

Mr. Matthew Hoff
Assistant United States Attorney
1301 New York Ave. NW, Suite 400
Washington, DC 20005

Mr. Steven Clymer
Assistant United States Attorney
100 S. Clinton Street
Syracuse, NY 13261

Re: *United States v. Shawna Reid*
WDWA No. CR19-117 JLR

Dear Mr. Hoff and Mr. Clymer:

Please accept this letter on behalf of Shawna Reid's defense team as a request for the following discovery in this matter. This request is intended to elicit all information potentially favorable or exculpatory as to Ms. Reid and/or material to her guilt or punishment. See Local CrR 16(a)(2)(E).

■ [REDACTED]

■ [REDACTED]

3. Any written or recorded statements of Shawn Reid and related summary reports and 302s, notes or other documentation of oral or written statements purportedly

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made by Ms. Reid to any person, whether a government investigator/official or not, relating to the Thomas Wales matter, including any statement(s) Ms. Reid made regarding [REDACTED]. This request includes, but is not limited to, any statement the government might potentially use in its case-in-chief.

4. [REDACTED]
5. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
9. [REDACTED]

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10. [REDACTED]
- [REDACTED]
12. [REDACTED]
13. Please describe in reasonable detail the procedure by which this indictment occurred. How was the indicting grand jury panel informed of Ms. Reid's prior grand jury testimony? What verbatim instructions were provided to the indicting panel prior to it hearing of Ms. Reid's grand jury testimony from February 28, 2018? Was it play-acted from a script or simply read into the record in front of the grand jurors? [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
16. Please produce any and all other exculpatory evidence or *Brady* material or early *Jencks* Act statements the government has in its possession regarding Shawna Reid that it has not yet provided in discovery.
- [REDACTED]

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[REDACTED]

Feel free to contact us if you have any further questions about these requests. To aid in our defense preparation, we ask that you produce this requested material within ten (10) days of this correspondence.

Additionally, please contact us to arrange a discovery conference, as contemplated by WDVA Local Criminal Rule 16, to include an inspection of any physical evidence possessed by the government related to this case.

Thank you.

Sincerely,

Kevin A. Peck

Michael Nance